

Punch Partnerships (PML) Ltd

The Swan Inn, HAVANT

Project Reference: 1710-046/TN/05

Technical Note

1 Response to highways comments

Introduction & summary of comments

- 1.1 Further to the submission of planning application APP/23/00588 comments have been received from Hampshire County Council (HCC), raising concern with overflow parking. A copy of the consultation response received in March 2024 is provided at **Appendix A**. This report sets out the points raised and provides responses / additional analysis.
- 1.2 The core matter discussed in the consultation response is that of the weekend parking surveys provided by TPA in a previous Technical Note. HCC suggest that some of the roads within the survey area are unsuitable for on street parking (despite not being subject to parking restrictions).
- 1.3 HCC go on to calculate theoretical levels of parking stress on the remaining roads (Jessie Road, St Michael's Road, Ernest Road and St Nicholas Road). A table is provided on the second page of the consultation response with peak parking stress for those roads and while an average figure is not provided, the average can be calculated as 75.75% on the Sunday (the busiest day). Notably there appears to be an error for Ernest Road, with the table suggesting 108% occupancy, whereas the recorded figure was 100%. HCC may have added on the one vehicle that was recorded as having parked on a crossover, however the survey company has confirmed that vehicle is included in the occupancy / stress figures for Ernest Road already.
- 1.4 The comments then go on to calculate peak stress for just three of the above roads, without any explanation as to why one (Jessie Road) has been excluded.

- 1.5 Following the above, the comments go on to look only at Jessie Road, seemingly suggesting that all overflow parking would use Jessie Road rather than being spread across each of the nearest roads to the site. There is no explanation or reasoning provided for this approach and it does not follow best practice.

Roads included in parking survey analysis

- 1.6 HCC's suggestion to exclude Hulbert Road from the survey analysis is accepted, however their reasoning for excluding Park Road is that it is a commuter route and that no parking was recorded on Park Lane during the surveys. The commuter route point is perhaps reasonable, but only with respect to the Friday and it is also noted that viewing Park Lane on Google aerial view shows parking does occur on Park Lane in the vicinity of the site. This is further reinforced by the fact that the single yellow lining on Park Lane only restricts parking Monday to Friday and only 8am – 9:30am and 2:30pm – 4pm. The highway authority has therefore clearly considered that parking on Park Lane is acceptable outside of these hours and therefore it is considered reasonable to include Park Lane in the analysis, at times outside of the restricted hours.

Sensitivity test

- 1.7 A sensitivity test, such as that which HCC has attempted to undertake, is often provided and the usual method is to reduce the analysis to fewer roads and to then recalculate the total parking availability and total parking stress across the reduced area, assuming that any overspill parking will be contained within those streets (not limited to one street). The results of the sensitivity test are set out in table 1.1.

Table 1.1 Parking survey sensitivity test

	Friday - 17:30			Saturday - 16:30		
	Occupied	Spaces	Stress (%)	Occupied	Spaces	Stress (%)
Jessie Road	8	8	50%	11	5	69%
St Michael's Road	11	8	58%	11	8	58%
St Nicholas Road	9	4	69%	8	5	62%
Ernest Road	13	0	100%	13	0	100%
Park Lane	0	12	0%	0	12	0%
Total	41	32	67%	43	30	70%
Total with overflow (7 vehicles)	48	25	66%	50	23	68%

- 1.8 The sensitivity test shows that, during the busiest time (peak demand on street coinciding with peak demand on site) parking stress within the survey area would be 68%, with 23 spare parking spaces. This is well below the 85 to 90% that is commonly considered as the acceptable threshold.
- 1.9 A similar exercise has also been undertaken excluding Park Lane and that shows peak stress at 82%, still below commonly accepted thresholds beyond which negative impacts upon traffic or safety may occur.

Lambeth Methodology guidance

- 1.10 A copy of the Lambeth Methodology, which is the most commonly accepted parking survey methodology across the UK, is provided at **Appendix B**. The guidance sets out on the second page, under the heading of 'Commercial Developments' that a 5 minute walk / 500m survey area is appropriate for commercial developments. The use of a 200m walk distance in this case is therefore considered to be extremely robust, excluding locations further from the site where visitors may park.

Parking restraint as a tool to influence travel mode choice

- 1.11 Parking restraint at 'destinations' is commonly accepted to be a key tool in achieving increased rates of sustainable travel. This is clearly a point that is agreed upon by HCC as, for example, Policy DM2 of the Hampshire Local Transport Plan 4 states at point i) that developments should be required to:

"use parking strategies, plans and pricing to lock in sustainable travel behaviours (e.g. low car developments, provision of EV charging points and parking spaces for car club vehicles, and good quality cycle parking)."

- 1.12 Additionally, the glossary to the Local Transport Plan 4 defines Parking Management as:

"Strategies to improve the efficiency of parking in an area e.g. public car parks and on street parking within a town. This may involve changing the number of spaces available and the cost to park, to influence the number of people driving into an area and hence traffic levels."

- 1.13 The stance taken by HCC with respect to this development proposal therefore conflicts with their own transport policies, failing to recognise that parking restraint will have any impact upon travel mode choice for visitors to the site and instead taking a 'predict and provide' approach. This is despite the site being well located within a high density residential 'walk in' catchment and being well served by public transport, as set out in chapter 2 of the Transport Statement submitted with the application.

2 Conclusion

- 2.1 The sensitivity test applied by HCC in their consultation response is flawed and contains a number of errors.
- 2.2 This report provides a sensitivity test following best practice guidance which shows that overflow parking from the development proposals can be accommodated on street without causing unacceptable levels of parking stress (based upon commonly accepted thresholds), even if we are to assume that parking restraint will have no impact upon the travel mode choice of visitors despite the highly accessible location of the site.

- 2.3 There is therefore considered to be no valid reason for the highway authority to conclude that the proposals will lead to highway safety issues to the extent that the grant of planning permission should be withheld and to do so would conflict with commonly accepted highways methodology and with planning precedent across the country.

Document Management

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Document Review

	Status	Author	Checker	Approver	Date
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-	Issue	GKO	NH	NH	March 24
A	Revision ¹				
B	Revision ²				

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APPENDIX A

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Enquiries To Sophie Osborne

Direct Line

Date 4 March 2024

My reference 052585

Your reference APP/23/00588

Email havantdc@hants.gov.uk

Dear Ms Wells,

The Swan, Jessie Road, Havant, PO9 3TH

Erection of 3 two-bed dwellings (Use Class C3) on the land adjacent to the public house, utilising new vehicular access, with associated parking and landscaping, including reconfiguration of beer garden and car park of the public house

Thank you for your re-consultation on the above planning application. The Highway Authority previously recommended refusal for this application within a formal response dated 15 December 2023.

In response to these comments, the applicant has submitted a revised Technical Note (hereafter, TN) which the Highway Authority have reviewed and have the following comments to make.

The Highway Authority have revisited the initial assessment work and the parking surveys undertaken in more depth. The scope of the parking survey has outlined the use of Hulbert Road (B2150) as being available for overspill parking. The results of the parking survey confirms that no parking occurs along the B2150 in the area studied, with a parking stress of 0% recorded. The B2150 is a classified road which provides access to the north to Asda roundabout and onwards towards the A3(M), and south towards Havant. Given the busy nature of the corridor, and presence of dropped kerb accesses to properties, on-street parking along this road is not considered suitable, which is reflected in current levels of parking stress observed within the survey. As a result, the Highway Authority does not consider that visitors to the Public House will park along the B2150.

Director of Hampshire 2050
Gary Westbrook

Park Lane was also recorded with 0% parking stress recorded over the study period. Whilst this is not a classified road, the Highway Authority understand that this is a commuter route and parking should not be encouraged.

The surrounding streets included within the study area cover an extensive area, and visitors to the public house are likely to park as close as possible (namely Jessie Road, St Michael's Road, Ernest Road and St Nicholas Road). Focussing on these roads specifically, the maximum parking stress has been recorded as follows on a Friday-Sunday (during the peak periods recorded for the public house):

	Recorded Parking Stress (%)		
	Friday	Saturday	Sunday
Jessie Road	63%	69%	69%
St Michael's Road	58%	58%	79%
Ernest Road	108%	108%	108%
St Nicholas Road	53%	59%	47%

Including Hulbert Road and Park Lane in the assessment work for calculating the total parking stress of the surrounding streets has therefore skewed the overall parking stress. Discounting these streets and only including St Michael's Road, Ernest Road and St Nicholas Road provides a parking stress of 73%, 75% and 78% Friday-Sunday respectively.

The results of the parking survey suggest that the peak demand at the Public House falls on a Friday-Sunday. Overspill parking would occur on a Friday and Saturday where the parking demand recorded suggests the proposed parking provision will be 5 and 7 spaces short respectively (the parking demand can be accommodated within the proposed parking numbers on a Sunday). This consequently pushes the parking stress onto Jessie Road to 94% on a Friday and 112% on a Saturday. Therefore, any displaced parking from Jessie Road will have an impact on the parking stress of St Michael's Road, Ernest Road and St Nicholas Road, increasing the parking stress.

The Highway Authority have undertaken a review of the appeal decisions with a particular focus on the application in Fareham where no objections had been provided by the same Highway Authority in 2023. The general trend suggests that whilst overspill parking was accepted, it did not push the parking stress to the level that the overspill parking would from this site. Generally, the overspill parking for those approved at appeal lead to a maximum parking stress of c. 40% which is not the case for this application.

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As a result of the revised parking stress assessment undertaken within this response, it has been demonstrated that the proposed development will result in further overspill parking on the local highway network. This results in parking stress levels of 94% and 112% on Jessie Road at peak times (Friday and Saturday), which is either close to or over parking capacity. The applicant is proposing 14 parking spaces which is a reduction in parking in accordance with Havant Borough Council's Parking Standards. The Highway Authority are therefore concerned that the under provision of parking on site does not accord with adopted parking standards, which would encourage the parking of vehicles on the public highway and so interrupt the free flow of traffic and cause a hazard to road users and a loss of amenity for existing residents and/or users of any formal on road parking.

The applicant has therefore failed to demonstrate that the proposed under provision of parking would not result in overspill parking which will cause stress on the local highway network.

The Highway Authority therefore maintains its reason for refusal in the response dated 15th December 2023.

Yours sincerely,

Sophie Osborne
Transport Planner – Highways Development Planning
Hampshire 2050

Director of Hampshire 2050
Gary Westbrook

APPENDIX B

LAMBETH COUNCIL PARKING SURVEY GUIDANCE NOTE

1. INTRODUCTION AND POLICY BACKGROUND

Most forms of development have the potential to increase the amount of on-street parking, more commonly known as parking stress. High parking stress can affect highway safety, the free-flow of traffic, amenity, access by emergency services, refuse collection and delivery of goods. Investigation of this impact forms an important part of the Council's analysis of proposed developments and therefore it is essential that enough information is submitted by a developer to allow a full analysis of the issue. An unacceptable increase in parking stress, or the submission of an insufficient level of information, can lead to a recommendation for refusal of a planning application.

Lambeth's policies on parking related to new development are based on the Mayor's London Plan, the Core Strategy and the saved policies of the Council's Unitary Development Plan 2007 (UDP). Developers are particularly advised to read Chapter 6 (London's Transport) of The London Plan, and the policies and standards, particularly Table 6.1 Parking Standards, contained therein. Chapter 6 of The London Plan can be viewed on the GLA's website at the following address:

<http://www.london.gov.uk/shaping-london/london-plan/strategy/chapter6.jsp>

Developers are also advised to read Criteria (f) of Core Strategy Policy S4, and the saved elements of UDP policies 14 and 17, although policy 39 may also be relevant. The Core Strategy and the saved policies of the UDP can be viewed on the Council's website at the following address:

<http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/LDFCoreStrategy.htm>

Ordinarily the Planning Department will not validate a residential planning application without a parking survey. In some cases parking surveys are required for commercial developments as well, depending on the scale and nature of the development. Submitting a survey enables the Council to make an informed decision, within statutory planning timescales, and benefits applicants in obtaining a quick decision.

A developer can propose on-site parking bays up to the maximum stated in Table 6.1 of the London Plan but in areas of high PTAL and within a CPZ a car free development (and permit exempt) would be expected unless acceptable justification is provided. However, even where on-site parking is proposed this may not accommodate all cars generated by a development, so a parking survey may still be required. An assessment of likely car ownership of future occupants can then be undertaken to understand the scale of any overspill parking. The cumulative effect of other consented development in the immediate area will also need to be taken into account when assessing the effect of parking on street.

Advice on whether a survey is required can be obtained from the Council's Transport Planning team by emailing transportplanning@lambeth.gov.uk with details of the proposed development. If a survey is not required a written response will be provided confirming this and should be submitted with the planning application.

2. UNDERTAKING A SURVEY

The following guidelines should be followed when undertaking a survey. If these guidelines are not followed the Council may not be able to make a full and proper assessment of the proposal.

Residential Developments

The Council requires a parking survey to cover the area where residents of a proposed development may want to park. This generally covers an area of 200m (or a 2 minute walk) around a site. For further detail see 'Extent of survey' below.

The survey should be undertaken when the highest number of residents are at home; generally late at night during the week. A snapshot survey between the hours of 0030-0530 should be undertaken on two separate weekday nights (ie. Monday, Tuesday, Wednesday or Thursday).

Commercial Developments

Surveys for commercial developments should cover an area within 500m walking distance (or a 5 minute walk) of a site. For further detail, see 'Extent of survey' below. Surveys should generally be done during proposed opening hours on an hourly beat basis.

Excluding the extent and time of the surveys the same principles apply as a survey for a residential development as set out below, but developers should contact the Council for further advice.

Survey times

For sites close to any of the following land uses, additional survey times may be necessary:

- Town centre locations: surveys should be undertaken Monday-Wednesday only.
- Regular specific evening uses close to the site (eg. church, etc): additional surveys should be undertaken when these uses are in operation.
- Commercial uses close to the site: morning and early evening surveys may also be required due to conflict with commuter parking. In these cases surveys between the hours of 0700-0830 and 1800-1900 may be required, noting the amount of parking on a 15-minute basis over this time.
- Railway stations/areas of commuter parking: additional morning and evening peak hour surveys will be required in order to assess the impact of commuter parking. These should be done between 0700-0800 and 1730-1830.

Surveys ***should not*** be undertaken:

- in weeks that include Public Holidays and school holidays and it is advised that weeks preceding and following holidays should also be avoided;
- on or close to a date when a local event is taking place locally since this may impact the results of the survey.

In some cases, the hours of the survey may need to be extended or amended. Applicants should contact the Council prior to undertaking a survey if there is any doubt.

Extent of survey

All roads within 200 metres (or 500m for commercial uses) walking distance of the site. Note this area is **NOT** a circle with a 200/500m radius but a 200/500m walking distance as measured along all roads up to a point 200/500m from the site.

Since people are unlikely to stop half way along a road at an imaginary 200/500m line so the survey should be extended to the next junction or shortened to the previous one, or taken to a suitable location along a road.

The following areas should be *excluded* from surveys:

- If the site is in a CPZ any parking bays in an adjoining CPZ should be excluded.
- If the site lies adjacent to, but not in, a CPZ then all roads in that CPZ should be excluded.
- Areas that fall outside of Lambeth should be excluded.
- Places where drivers are unlikely to want to park, for example:
 - If there is no possibility of parking somewhere within the 200m boundary
 - If drivers would not wish to park in an area, due to perceived safety issues, or difficulty in accessing the parking for example.

Common sense should be applied in all cases and the extent of the survey area and justification for any amendments should be included in the survey. If inadequate justification is provided for a survey area then amendments may be required or a recommendation made accordingly.

Required Information

The following information should be included in the survey results, to be submitted to the Council:

- The date and time of the survey.
- A description of the area noting any significant land uses in the vicinity of the site that may affect parking within the survey area (eg. churches, restaurants, bars and clubs, train stations, hospitals, large offices, town centres etc).
- Any unusual observations, e.g. suspended parking bays, spaces out of use because of road works or presence of skips, etc.
- A drawing (preferably scaled at 1:1250) showing the site location and extent of the survey area. All other parking and waiting restrictions such as Double Yellow Lines and Double Red Lines, bus lay-bys, kerb build-outs, and crossovers (vehicular accesses) etc should also be shown on the plan.
- The number of cars parked on each road within the survey area on each night should be counted and recorded in a table as shown below. It would be helpful to note the approximate location of each car on the plan (marked with an X).
- Photographs of the parking conditions in the survey area can be provided to back-up the results. If submitted, the location of each photograph should be clearly marked.

Areas Within A Controlled Parking Zone (CPZ)

Only Resident Permit Holder (RPH) Bays and Shared Bays which allow residents parking (these may be shared with Pay-and-Display parking and/or Business Permit Holders) should be counted.

To calculate parking capacity each length of parking bay must be measured and then converted into parking spaces by dividing the length by 5 (each vehicle is assumed to measure 5m) and rounding down to the nearest whole number. For example a parking bay measuring 47m in length would provide 9 parking bays ($47/5=9.4=9$). The capacity of each separate parking bay must be calculated separately and then added together to give a total number of parking spaces for each road in the survey area.

The results should generally be presented in the following format (figures given as an example):

Street Name	Total Length (m) of parking spaces	No. of RPH parking spaces	No. of cars parked in RPH bays	RPH Parking Stress (%)
A Street	350	70	70	100
B Street	250	50	40	80
C Street	150	30	10	33
Total	750	150	120	80

A separate note should be made of any areas where cars can legally park overnight. These are generally Single Yellow Lines or Single Red Lines (SYL/SRL) or short term parking or Pay-and-Display bays (ST). The number of cars parked in these areas should be counted and presented separately.

Areas Not In A Controlled Parking Zone (CPZ)

All areas of unrestricted parking should be counted. To calculate parking capacity each length of road between obstructions (such as crossovers, kerb build-outs, yellow lines, etc) must be measured and then converted into parking spaces by dividing the length by 5 and rounding down to the nearest whole number. For example a length of road measuring 47m in length would provide 9 parking bays ($47/5=9.4=9$). The capacity of each section of road must be calculated separately and then added together to give a total number of parking spaces for each road in the survey area.

The distance between crossovers should be measured in units of 5m. For example, if the distance between 2 crossovers or a crossover and a junction is 12m then only 10m should be counted in the survey, and any space between crossovers measuring less than 5m should be discounted from the calculation. For reasons of highway safety, the first 5m from a junction should also be omitted from the calculation.

A map or plan showing the measurements used in calculating parking capacity should be supplied so that this can be verified by the Council. The parking survey may not be accepted if this is not supplied.

The results should generally be presented in the following format (figures given as an example):

Street Name	Total Length (m) of kerb space	Length of unrestricted parking (m)	No. of parking spaces	No. of cars parked on unrestricted length of road	Unrestricted Parking Stress (%)
A Street	400	350	70	70	100
B Street	300	250	50	40	80
C Street	200	150	30	10	33
Total	900	750	150	120	80

UNDERSTANDING THE RESULTS

The results of the parking survey will be analysed by the Council in accordance with the London Plan and saved policies in the Council's UDP, any Supplementary Planning Documents produced by the Council in relation to parking, and any other Transport policy guidance produced by the Council, Transport for London, or nationally.

The Council will also take into consideration the impact of any recently permitted schemes in determining the acceptability or not of each proposed development.

Note that stress levels of over 100% stress (or 100% occupancy level) are possible. This is because small cars may need less space than 5 metres to park, meaning that additional cars can be accommodated.

FURTHER ASSISTANCE

For further assistance or explanation please contact the Council's Transport Planning and Strategy team at the address below

Spanish

Si desea esta información en otro idioma, rogamos nos llame al 020 7926 2618.

Portuguese

Se desejar esta informação noutro idioma é favor telefonar para 020 7926 2618.

Yoruba

Tí ẹ ba fẹ ìmoràn yí, ní èdè Òmíràn, ẹjọ, ẹ kàn wà l'ágogo 020 7926 2618.

French

Si vous souhaitez ces informations dans une autre langue veuillez nous contacter au 020 7926 2618.

Bengali

এই তথ্য অন্য কোনো ভাষায় আপনার প্রয়োজন হলে অনুগ্রহ করে ফোন করুন 020 7926 2618.

Twi

Se woƿe saa nkaeboy yi wo kasa foforo mu a fre 020 7926 2618.

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